#### Submission Date Between 10/29/2009 and 04/07/2010

**Key Topic: Food Groups** 

Comment ID: 000880

Submission Date: 03/01/2010

Organization Type: Educational Institution

Organization Name: Creighton University Osteoporosis Research Center

First Name: Karen

Last Name: Rafferty

Job Title: Senior Research Dietitian

**Key Topic:** Evidence-based Review Process, Food Groups, Minerals

Sub Topic: Calcium, Milk

Attachment: Y

Comment: Please see attached letter.

Comment ID: 000750

Submission Date: 11/05/2009

Organization Type: Educational Institution
Organization Name: Nutritional ConCerns?

First Name: Alberta

Last Name: Scruggs

Job Title: Nutrition Educator

Key Topic: Food Groups

**Sub Topic:** Meat, Beans, Eggs, Fish, and Nuts, Other, Vegetables

Attachment: N

Comment: As a nutrition and weight management educator, I believe foods should be grouped together according to kcalorie content first. It is difficult to expect clients to follow

recommendations when some are not clear.

I suggest corn, peas, potatoes and yams be included in the grain group (kcalorie content per serving = 80, while vegetables are 25 or less). Nuts be included in fats because they are fats.

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#### Submission Date Between 10/29/2009 and 04/07/2010

**Key Topic: Food Groups** 

Comment ID: 000874

Submission Date: 02/25/2010 Organization Type: Federal Agency Organization Name: U.S. ARMY

First Name: MAX

FAMBRO Last Name: **SOLDIER** Job Title:

**Key Topic:** Carbohydrates, Eating Patterns, Energy Balance/Physical Activity, Food Groups

**Sub Topic:** 

Attachment: N

Comment: I eat in the Dining Facilities on post here at FT Stewart, Ga. and I have to say that I am appalled by the amount of gravy laden, fried entrée choices offered everyday. The Army expects us to perform like athletes but feeds us like were homeless! White rice, Fried potatoes, fried cabbage, fried chicken, fried meat, stir fried vegetables, ect. Its very frustrating to see FAT soldiers but there is NO accountability in the dining facility. Biscuits and gravy with fired eggs and sausage add in some fried hash browns. PATHETIC! They just don't do enough to promote a performance eating lifestyle. I tell my young soldiers that they should view food as fuel not a way to satisfy hunger. Most take heed after a good 5 miler @ 7 min/mi pace (most fall out). Then I explain sound nutrition and the ones that apply it reap the rewards!

Comment ID: 000788

Submission Date: 01/10/2010

**Organization Type:** Individual/Professional

Organization Name: Be Well, Laura L-Health Counseling and Wellness

First Name: Laura Last Name: Lehrhaupt

Job Title: Certified Holistic Health Counselor

**Key Topic:** Carbohydrates, Eating Patterns, Food Groups

Sub Topic: Added sugars, Vegetables

Attachment: N

Comment: I firmly believe we eat too much animal protein. It not only makes us unhealthy it makes the planet unhealthy. I am also hoping that the dairy recommendations will be greatly

decreased. It is not necessary to drink consume another animals milk. Many Americans have adverse reactions to eat and don't even realize it.

Please address that vegetables (not including tomatoes or potatoes) need to be increased, fruit should stay at 1-2 serving a day. Processed sugar should be close to eliminated. Mention drinking clean water instead of carbonated, caffeine drinks and include the family dinner table. Thank you.

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#### Submission Date Between 10/29/2009 and 04/07/2010

**Key Topic: Food Groups** 

**Comment ID:** 000894

Submission Date: 03/25/2010

**Organization Type:** Individual/Professional

Organization Name: CHEF Clinic Santa Barbara (Cooking, Healthy Eating and Fitness)

First Name: John

Last Name: La Puma MD

Job Title: Founder and Director

**Key Topic:** Eating Patterns, Evidence-based Review Process, Food Groups

Sub Topic: DASH, Vegetables

Attachment: N

Comment: As a physician, chef and medical ethicist, I have seen patients who need help the guidelines could give them. But it has not, yet.

In my work in culinary medicine, I examined over 3000 peer-reviewed studies to attempt to identify eating patterns that were effective in preventing and treating 40 common conditions. We were able to do so. In analyzing and creating recipes for the DASH Diet for hypertension, it became clear that the importance of flavorful, easy preparations of vegetables is underestimated in achieving a healthy weight and healthy lifestyle. The current guidelines do not reflect the advantages of a more plant-

food centered healthful fat diet diet high in vegetables, fruits and legumes, but they could. I would be happy to offer more detailed comment, if desired.

Comment ID: 000780

Submission Date: 12/20/2009

Organization Type: Individual/Professional

Organization Name: N/A

First Name: Lisa Last Name: M

Job Title: Veterinary Industry

**Key Topic:** Eating Patterns, Food Groups

**Sub Topic:** 

Attachment: N

Comment: I first tried eating according to the food guide pyramid in a college Karate class when I was in my 30's. I lost 15lbs without trying. I am now in my 40's and have been doing the

FGP for almost a year. I am the leanest I've been in my life and I no longer have to do a forced fitness routine. I can simply stay naturally active and the weight still continues to drop off..and I can come home from work and relax instead of doing an hour of exercise every day. The FGP works if you write down what you eat. I have a log book that I log each portion into each category every day. I am devoted. There are days when I can't eat all my portions because I'm just too stuffed. I've never felt or looked better and I have the Food Guide Pyramid to thank for that. Obesity involves other factors and the FGP should not be blamed for Americans not being able to control their eating habits. It's very, very, very easy. At 43, I am thinner than the 20 & 30-somethings that I work with. I've given away 5 bags of clothes to Good Will and still have a closetful of clothes that are too

big for me. The FGP works.

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#### Submission Date Between 10/29/2009 and 04/07/2010

**Key Topic: Food Groups** 

Comment ID: 000764

Submission Date: 11/19/2009

Organization Type: Individual/Professional Organization Name: Nutrition and wellness

First Name: Yolanta

Last Name: Roman

Job Title: Diabetic educator

**Key Topic:** Eating Patterns, Food Groups

Sub Topic: MyPyramid, Vegetables

Attachment: N

Comment: Please check Japanese food pyramid spinning top

vegetables are high on the Piramid and fruits are on the bottom

we need it in the USA

Vegetables and fruits not fruits and vegetables

**Comment ID:** 000765

Submission Date: 11/23/2009

Organization Type: Individual/Professional

Organization Name:
First Name: Andrew
Last Name: Milkowski

Job Title: Adjunct Professor, University of Wisconsin

**Key Topic:** Eating Patterns, Food Groups

Sub Topic: Meat, Beans, Eggs, Fish, and Nuts, Other

Attachment: Y

**Comment:** Comment on underlying hypotheses for epidemiological associations between diet and cancer.

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#### Submission Date Between 10/29/2009 and 04/07/2010

**Key Topic: Food Groups** 

**Comment ID:** 000858

Submission Date: 02/11/2010

Organization Type: Individual/Professional

Organization Name:
First Name: Susan
Last Name: Zabriskie

Job Title: Registered Dietitian

**Key Topic:** Eating Patterns, Food Groups

Sub Topic: MyPyramid

Attachment: N

Comment: The 2005 Guidelines were so helpful in supporting increased consumption of fruit and vegetables. When I can recommend this as backed up by "Government Policy" it usually

has more impact! However, I recommend revision of the pyramid to something closer to the past incarnations. This may-pole configuration was useless to me in my work. I used

it only as a jumping off point in training sessions to

point out that its ok to seriously question government driven policy and tools at times, and that if it seems impossible to use that's because it is...the more complicated you make this the less functional it becomes. I have been instructing groups and individuals on nutrition for over 30 years and I really think you might consult those of us in practice as much as you do the research findings. Believe it or not we actually do know how to process that information to create user-friendly accessible teaching materials.

I also would like to comment that the findings of the Mediterranean studies and the China study merit more attention than you have given them. The increase in plant-based foods, along with the reduction of refined carbohydrates can be emboldened at this point in time.

Thank you for the opportunity to comment.

Sincerely.

Susan Stern Zabriskie MS, RD #437904

**Comment ID: 000896** 

Submission Date: 03/26/2010

Organization Type: Individual/Professional

Organization Name:
First Name: Nancy
Last Name: Daigle
Job Title: RD

Key Topic: Eating Patterns, Food Groups, Nutrient Density/Discretionary Calc

Sub Topic: Fruits, Grains, Whole grains, Meat, Beans, Eggs, Fish, and Nuts, Milk, Vegetables

Attachment: N

**Comment:** This is the reference for the American Heart Association's criteria for the Heart-Check mark used for the AHA's on-line Grocery List Builder:

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#### Submission Date Between 10/29/2009 and 04/07/2010

**Key Topic: Food Groups** 

http://www.americanheart.org/presenter.ihtml?identifier=4973

I mentioned this in my Submission 000892.

In conjunction with the Nutrition Facts label this AHA Heart-Check mark is really quite helpful. I shop weekly in the 32nd St Naval Commissary (the largest and most modern in the world), a top of the line San Diego supermarket chain Ralph's, a budget supermarket Food-4-Less, and sometimes in Whole Foods or Trader Joe's. Sometimes it is difficult to find Lower Sodium canned dry beans (I suggested rinse/drain), and some of the brands listed in all AHA Grocery List Builder categories. As you know I have included: Healthy/Light pasta sauce, Lean/Healthy frozen entrees/meals, Light/Healthy soups/broth, 95-97% Fat Free Healthy-Deli meat, Light salad dressing etc, on My Pyramid Shopping List Submission, with a blue asterisk ("Contains more than 300 mg sodium but okay"). The average sodium content for my 8" Plate models is >1500-2300 mg/day, but still w/in <3 -4000 mg or no added salt level. Light salad dressing contributes the most to this total. I do see sodium intake in the general population vs the 1500-2300 mg recommendation as kind of "an elephant in the living room". Most people consume 2-3 times the daily sodium recommendation. The Light/Healthy foods, endorsed by the AHA, are a step down in calories, saturated fat, cholesterol and sodium.

I do realize that to "best practice" model dictates that the 3 sample Plates should total no more than 1500-2300 mg sodium/day (or weekly average). Of course these 3 sample Plates can be adjusted to lower the sodium content; for example replacing Light salad dressing with oil and vinegar etc. Having said this people still do need step down alternatives to commonly consumed higher sodium processed foods and convenience foods like: Healthy Choice, Healthy Request, Heart Smart, Light etc...

**Comment ID: 000897** 

Submission Date: 03/26/2010

Organization Type: Individual/Professional

**Organization Name:** First Name: Nancy Last Name: Daigle

RD Job Title:

Eating Patterns, Food Groups, Nutrient Density/Discretionary Calc **Key Topic:** 

Grains, Whole grains, Meat, Beans, Eggs, Fish, and Nuts, Milk, Vegetables **Sub Topic:** 

Attachment: N

Comment: http://www.webmd.com/food-recipes/features/the-best-of-the-light-salad-dressings

Link to excellent Web MD article on Light salad dressings.

"Although a variety of dressings is always welcome, oil-and-vinegar based dressings, for the most part, have the nutritional advantage. A study published in the American Journal of Clinical Nutrition in 2003 found that women who used oil-and-vinegar salad dressings frequently (at least five times a week) had a 50% lower risk of fatal coronary artery disease than those who rarely ate this type of dressing. This link persisted even after the researchers adjusted for heart disease risk factors and consumption of vegetables."

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#### Submission Date Between 10/29/2009 and 04/07/2010

**Key Topic: Food Groups** 

**Comment ID: 000886** 

Submission Date: 03/17/2010

Organization Type: Individual/Professional

Organization Name:
First Name: Nancy
Last Name: Daigle

Job Title: RD

**Key Topic:** Eating Patterns, Food Groups, Nutrient Density/Discretionary Calc

Sub Topic: Fruits, Grains, Whole grains, Meat, Beans, Eggs, Fish, and Nuts, Milk, Vegetables

Attachment: Y

**Comment:** I want to submit 4 attached files unzipped. I will try and if only one attaches I will attach each as a separate submission:

Comments for Plate.doc

Dietary Guidelines Breakfast Plate.doc Dietary Guidelines Lunch Plate.doc Dietary Guidelines Dinner Plate.doc

**Comment ID: 000887** 

Submission Date: 03/17/2010

Organization Type: Individual/Professional

Organization Name:
First Name: Nancy
Last Name: Daigle
Job Title: RD

**Key Topic:** Eating Patterns, Food Groups, Nutrient Density/Discretionary Calc

Sub Topic: Fruits, Grains, Whole grains, Meat, Beans, Eggs, Fish, and Nuts, Milk, Vegetables

Attachment: Y

**Comment:** Please combine with my Submission 000886

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#### Submission Date Between 10/29/2009 and 04/07/2010

**Key Topic: Food Groups** 

**Comment ID:** 000889

Submission Date: 03/17/2010

Organization Type: Individual/Professional

Organization Name:
First Name: Nancy
Last Name: Daigle

Job Title: RD

Key Topic: Eating Patterns, Food Groups, Nutrient Density/Discretionary Calc

Sub Topic: Fruits, Grains, Whole grains, Meat, Beans, Eggs, Fish, and Nuts, Milk, Vegetables

Attachment: Y

Comment: Please combine with my Submissions: 000886, 000887, 000888

**Comment ID: 000890** 

Submission Date: 03/17/2010

Organization Type: Individual/Professional

Organization Name:
First Name: Nancy
Last Name: Daigle
Job Title: RD

Key Topic: Eating Patterns, Food Groups, Nutrient Density/Discretionary Calc

Sub Topic: Fruits, Grains, Whole grains, Meat, Beans, Eggs, Fish, and Nuts, Milk, Vegetables

Attachment: Y

Comment: I sent Dietary Guidelines Dinner Plate twice as Submissions: 000886 and 000888. I meant to send this attachment Dietary Guidelines Lunch Plate as well. Please combine with

my Submissions: 000886 (Dinner), 000887 (Breakfast) and 000889 (Comments). Thank you very much for your patience. I'm insecure with the process used to zip files.

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#### Submission Date Between 10/29/2009 and 04/07/2010

**Key Topic: Food Groups** 

**Comment ID:** 000892

Submission Date: 03/21/2010

Organization Type: Individual/Professional

Organization Name:
First Name: Nancy
Last Name: Daigle
Job Title: RD

**Key Topic:** Eating Patterns, Food Groups, Nutrient Density/Discretionary Calc

Sub Topic: Fruits, Grains, Whole grains, Meat, Beans, Eggs, Fish, and Nuts, Milk, Vegetables

Attachment: Y

Comment: Dietary Guidelines Dinner Plate2.doc

I changed the wording in the Dinner Plate's Vegetable quadrants to:

"fresh, frozen, or canned No Salt Added, cooked green beans (green peas)" Now it matches the My Pyramid Shopping List.

Another point: I have used the Analyze Your Food Intake feature of the MyPyramid Tracker to calculate the sodium in my sample Plates and snacks. I realize that my sample 2000 calorie: 3 Plates + 2 snacks are closer to 3800 mg Sodium (still w/in 3-4000 mg/day) rather than 2300 mg recommended. Light salad dressing can be replaced with an oil and vinegar dressing, but in reality most people probably choose the bottled dressings. The My Pyramid Shopping List also contains other Healthy/Light foods that are over 300 mg sodium per Label Serving size (and reference amount) like: soups, frozen entrees. These items are also on the American Heart Association's Grocery List Builder.

Perhaps my contribution of the visual idea of the Plates will help in meal planning and portion control.

Comment ID: 000885

Submission Date: 03/17/2010

Organization Type: Individual/Professional

Organization Name:
First Name: Pratibha
Last Name: Patel
Job Title: MS, RD

**Key Topic:** Eating Patterns, Food Groups, Other

Sub Topic: MyPyramid, Other

Attachment: N

Comment: So far, the "MY PYramid" model has failed in practical application because of the complexity of translation of colored "bands" and the EXTRA materials involved in teaching it.

There are simpler easier models such as food plates, take-away containers and bowls (what people eat from!) to demonstrate portions and food groups. There is no food label

teaching that would educate on energy intake versus physical activity.

More emphasis on specific energy usage in physical activity and equivalent examples of food group intake would provide a better educational tool since research shows the population overestimates their physical activity and underestimates their energy intake (portions and food choices).

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# Submission Date Between 10/29/2009 and 04/07/2010

**Key Topic: Food Groups** 

Simple to implement behavior models are essential to increase awareness of how it affects intake and exercise as a new section of these guidelines.

**Comment ID:** 000899

Submission Date: 03/30/2010

Organization Type: Individual/Professional

Organization Name: Kelly Consulting

First Name: Last Name: Job Title:

**Key Topic:** Eating Patterns, Food Groups, Protein

**Sub Topic:** Meat, Beans, Eggs, Fish, and Nuts

Attachment: Y

Comment: Consumer research on protein usage patterns and understanding of plant-based protein terminology

**Comment ID:** 000822

Submission Date: 01/26/2010

Organization Type: Individual/Professional

Organization Name:
First Name: Nadine
Last Name: Pranckunas

Job Title: RN

**Key Topic:** Evidence-based Review Process, Food Groups **Sub Topic:** Meat, Beans, Eggs, Fish, and Nuts, Vegetables

Attachment: N

Comment: Please consider Dr. T.Colin Campbell's research "The China Study" indicating the adverse effects of animal protein including dairy protein on humans and the positive effect of a

plant based diet.

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#### Submission Date Between 10/29/2009 and 04/07/2010

**Key Topic: Food Groups** 

**Comment ID:** 000823

Submission Date: 01/26/2010

Organization Type: Individual/Professional

Organization Name:
First Name: Kelly
Last Name: Moltzen

Last Hame: Workzen

Job Title: Graduate Student, Dietetic Intern

**Key Topic:** Fats, Food Groups

Sub Topic: Fish oil, Omega 3 fatty acids, Fruits, Grains, Whole grains, Meat, Beans, Eggs, Fish, and Nuts, Milk, Vegetables

Attachment: N

Comment:

The evidence is clear that omega-3 fatty acids are anti-inflammatory and omega-6 fatty acids are pro-inflammatory. So why do the guidelines recommend having ~10x more omega-6 fatty acids in our diet than omega-3? Historically mankind consumed these fats in a ratio that was much closer to 1:1. It has also been shown that conventionally raised animals and farm-raised fish that have been fed grains have higher levels of omega-6 fatty acids, while grass-fed animals and fish fed a natural diet have higher levels of omega-3 fatty acids. Since the anti-inflammatory nature of omega-3 fat is linked to many beneficial health effects, foods containing omega-3 fats should be highlighted much more in the dietary guidelines. This may mean telling the public to buy grass-fed meats and wild fish, although of course if telling the public to eat more fish, it would also be necessary to include information about being mindful of whether or not one's fish is being sourced from contaminated waters.

As Dr. Marion Nestle shows us in her book "Food Politics," the beef and dairy industries have contributed substantial amounts of money and lobbying efforts in order for their products to have a place in the Dietary Guidelines. However, the DG should not be based on the lobbying power of the food industry - it should be based on science, and science tells us that the most beneficial foods are fruits, vegetables, and whole grains. As a matter of fact, as Dr. Daphne Miller uncovers in her book "The Jungle Effect" the aspects of food that have proven beneficial over time through various cultures are the foods' antioxidative properties, omega-3 levels, slow-release capabilities, and fermentation capacity.

By relying too much on the term "moderation" and the maxim "all foods can fit," we are confusing the public in terms of which foods are good for us. I have seen this quite clearly through the lens of the American Dietetic Association. If you want clear advice in terms of which foods are healthy, please go to the Hunger and Environmental Nutrition Dietetic Practice Group of the American Dietetic Association.

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#### Submission Date Between 10/29/2009 and 04/07/2010

**Key Topic: Food Groups** 

**Comment ID:** 000794

Submission Date: 01/14/2010

Organization Type: Individual/Professional

Organization Name:
First Name: Nancy
Last Name: Daigle

Job Title: RD 00289146

Key Topic: Fluid and Electrolytes, Food Groups, Nutrient Density/Discretionary Calc

Sub Topic: Fruits, Grains, Whole grains, Meat, Beans, Eggs, Fish, and Nuts, Milk, Other, Sodium, Vegetables

Attachment: Y

Comment: I will attach my resume on a separate comment e-mail

**Comment ID:** 000919

Submission Date: 04/07/2010

Organization Type: Individual/Professional

Organization Name: Owen Clinic

First Name: Stuart Last Name: Katsh

Job Title: Registered Dietitian

**Key Topic:** Fluid and Electrolytes, Food Groups, Protein

Sub Topic:

Attachment: N

Comment: First I appreciate this enormous task this committee has taken on. Thank you.

I reviewed some of the comments posted and agree with most of what I read. I believe the base of the pyramid/healthful eating should be exercise and water. That is, regular activity and plain unsweetened, non-caloric old fashioned water. I add this not to due the ?old? adage of 8 glasses a day, because so many people have little or no water and instead have sweetened water, and other sugar rich beverages. We have enough evidence to show that these drinks are unhealthy. In addition if there were a way to relegate red meats, animal fats, additional/added sugars/refined foods to the top of pyramid that would be awesome. In sum: An emphasis on whole grains, plant based foods (including. legumes, whole vegetables, whole fruits, etc) coupled with the modified intake of (smaller realistic servings) of animal based proteins.

Also all educational material should be in Spanish as well as English These are just a few of my suggestions. Thank you.

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#### Submission Date Between 10/29/2009 and 04/07/2010

**Key Topic: Food Groups** 

**Comment ID:** 000878

Submission Date: 03/01/2010

Organization Type: Individual/Professional

Organization Name:
First Name: Nancy
Last Name: Daigle
Job Title: RD

**Key Topic:** Food Groups

Sub Topic: Fruits, Grains, Whole grains, Meat, Beans, Eggs, Fish, and Nuts, Milk, Vegetables

Attachment: Y

Comment: re: Comment ID 000876 My Pyramid Shopping List on 2/26/2010. In the document attached today 3/1/2010 My Pyramid Shopping List2 I added:

pg 3: "Reduced Fat" to whole wheat crackers, plain to Baked tortilla

pg 4: "plain" to Baked potato chips

pg 5: "try Healthy/Light brands" to Canned\* red pasta/Spaghetti sauce (marinara)

This should bring these food choices more closely in-line with the nutrient dense nutrient values used for calculation

On another subject: Is the label term "Diet" used on soda an FDA interchangeable term for calorie free or sugar free? I think these sodas should be labeled to inspire people to make better choices by avoiding added sugars not dieting per se. They still don't contribute nutrients but at least added sugars are avoided.

**Comment ID: 000821** 

Submission Date: 01/26/2010

Organization Type: Individual/Professional

Organization Name:
First Name: Nancy
Last Name: Daigle
Job Title: RD

**Key Topic:** Food Groups

Sub Topic: Fruits, Grains, Whole grains, Meat, Beans, Eggs, Fish, and Nuts, Milk, Vegetables

Attachment: Y

Comment: the attached is an addendum to my Idea 3 submitted within the file that I submitted 1/15/10

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#### Submission Date Between 10/29/2009 and 04/07/2010

**Key Topic: Food Groups** 

Comment ID: 000797

Submission Date: 01/15/2010

Organization Type: Individual/Professional Organization Name: Nutritional Concepts Inc.

First Name: Bonnie Last Name: Minsky

Licensed Dietitian Nutritionist and Public Health Educator Job Title:

**Key Topic:** Food Groups

Grains, Whole grains, Milk Sub Topic:

Attachment: N

Comment: GRAINS

I totally disagree with the Dietary Guideline's promotion of whole wheat and excessive grain intake. The USDA should not allow anyone on the Board making nutritional recommendations if they have ever worked for the food industry. The Wheat Council was represented in the last Dietary Guidelines.

I have been a nutrition and public health expert for 25 years. I have rarely seen any client digest whole wheat well. The more grains eaten, the more health problems, including weight gain occur. One out of 100 people in the U.S. now has celiac disease. According to experts who are now studying inflammatory gluten intolerance, one of 50 Americans may be affected, causing many health problems. Wheat not only contains the most gluten of any food, but it also is one of the most allergenic foods.

Fruits and vegetables should be promoted as the most important carbohydrates (see my attached Circle of Health) due to their great fiber and antioxidant benefits as well as to their low allergy potential.

The milk industry was also represented when the last set of Dietary Guidelines was planned. The increased recommendation for three glasses of cow's milk daily was ridiculous. Sixty percent or more Americans are lactose intolerant. Milk is also the most prominent food allergen in the United States. It can negatively affect insulin response and may be implicated in cases of Type I Diabetes. It has been proven to cause weight GAIN, NOT WEIGHT LOSS, which is why the Federal Trade Commission forced the Dairy Council to stop ads stating people lose weight from drinking milk

Because calcium and Vitamin D are very important, the new dietary guidelines should state:

"Drink 16 oz. of cow's milk or a fortified milk substitute daily. In addition, one serving of low fat yogurt or low fat goat/sheep/cow cheese is recommended. If milk products are not tolerated or desired. Vitamin D and Calcium must be taken in a supplement form as recommended by a licensed health professional."

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#### Submission Date Between 10/29/2009 and 04/07/2010

**Key Topic: Food Groups** 

**Comment ID:** 000799

Submission Date: 01/17/2010

Organization Type: Individual/Professional

Organization Name:
First Name: Jane
Last Name: Fox

Job Title: retired

**Key Topic:** Food Groups

Sub Topic: Attachment: N

Comment: The 2005 Pyramid makes it look as if everyone must eat dairy products. People can beallergic to milk protein (different from lactose intolerant). They can get all necessary

nutrients from other foods. So can vegans. So pls include alternatives.

**Comment ID: 000801** 

Submission Date: 01/18/2010

Organization Type: Individual/Professional

Organization Name: First Name: Marty

Last Name: Davey, MS, RD

Job Title: Dietitian

**Key Topic:** Food Groups

Sub Topic: Milk
Attachment: N

Comment: As a registered dietitian in an inner-city residential treatment facility for older youth and teens with behavioral issues, I feel the need to change the "Milk" catagory to "Calcium".

Over 60% of my clients are lactose intolerant to milk. Half of those are allergic to cheese in all forms.

There is overwhelming evidence that dairy-based calcium is not absorbed as well as calcium from many dark, green leafy vegetables as well as from many brands of tofu.

If my clients do not like the taste of Lactaid, they do not have a calcium source. Even though soy and rice milks have equal amounts of calcium, they are not reimbursed to the same amount as dairy milk. Therefore, our facility cannot afford them and the clients suffer.

Since 99% of Native Americans, 99% of Asians, over 50% of Hispanic Americans, and 70% of African Americans are lactose intolerant, why do we insist on milk being the only acceptable calcium source?

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#### Submission Date Between 10/29/2009 and 04/07/2010

**Key Topic: Food Groups** 

We need to be at least as progressive as our neighbors to the north in Canada and change the moniker to Calcium. We need to include all sources of calcium in this group and not limit ourselves to the digestive proclivities of Northern Europeans.

Without this our schools will continue to discriminate against the lactose intolerant population.

**Comment ID:** 000792

Submission Date: 01/13/2010

Organization Type: Individual/Professional

Organization Name:
First Name: Theresa
Last Name: Davis

Job Title: Deputy Principal
Key Topic: Food Groups

Sub Topic: Fruits, Grains, Whole grains, Vegetables

Attachment: N

Comment: Please ensure that the 2010 version of the pyramid is user friendly for all food chooses including those selecting a healthy vegetarian diet

Comment ID: 000793

**Submission Date:** 01/13/2010

Organization Type: Individual/Professional

Organization Name:
First Name: Janine
Last Name: Sanders

Job Title: cooking teacher

Key Topic: Food Groups

Sub Topic: Milk
Attachment: N

Comment: A large percentage of humans are lactose intolerant. Please address this when considering dietary guidelines and please encourage food and drug manufacturers to label

products that contain milk. Many food and drug products contain lactose as a filler and this should also be listed on a food label.

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#### Submission Date Between 10/29/2009 and 04/07/2010

**Key Topic: Food Groups** 

**Comment ID:** 000756

Submission Date: 11/10/2009

Organization Type: Individual/Professional
Organization Name: Colorado State University

First Name: Lana
Last Name: Olsson

Job Title: Staff/ associate

Key Topic: Food Groups

Sub Topic: Meat, Beans, Eggs, Fish, and Nuts

Attachment: N

Comment: Please put legumes in the Meat group only & get them out of the vegetable group; it is too confusing & their primary nutrient should be protein. Also, please decide on a serving size of 1/4 cup of cooked legumes in making recommendations. It is better to double, tripe or quadruple the amount for higher cal. levels, & will help the consumer realize that

they can easily consume 1 serving. If 2 servings are needed to equal 1 oz of meat, that is understandable. Also, consider in consumer information, that pureed legumes have an

even smaller serving size, due to decreased volume when pureed. Thank you.

**Comment ID: 000831** 

Submission Date: 02/01/2010

Organization Type: Individual/Professional

Organization Name:
First Name: Christine
Last Name: Palumbo, RD

Job Title: Nutrition Communications Consultant

**Key Topic:** Food Groups **Sub Topic:** Vegetables

Attachment: Y

**Comment:** Recommend potatoes remain in vegetable category

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#### Submission Date Between 10/29/2009 and 04/07/2010

**Key Topic: Food Groups** 

**Comment ID:** 000862

Submission Date: 02/14/2010

Organization Type: Individual/Professional

Organization Name:

First Name: D

Last Name: PETERSON

Job Title: RETIRED

**Key Topic:** Food Groups

Sub Topic: Attachment: N

Comment: The pyramid is very comprehensive but too complicated for people like me who do not understand computers. . .

**Comment ID: 000863** 

**Submission Date:** 02/15/2010

Organization Type: Individual/Professional

Organization Name:
First Name: Mark
Last Name: Tapp

Job Title:

**Key Topic:** Food Groups

Sub Topic: Attachment: N

Comment: Look to the HEALTHY FOOD PYRAMID by University of Michigan of Integrative Medicine. WATER is the base of the pyramid and NEEDS to be on whatever you provide as a

template. Our bodies are more than 75% water...brain 80% water...blood 90% water. Healthy water and proper hydration are critical to good health.

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#### Submission Date Between 10/29/2009 and 04/07/2010

**Key Topic: Food Groups** 

**Comment ID:** 000840

Submission Date: 02/03/2010

Organization Type: Individual/Professional

Organization Name: First Name: Joel

Last Name: Yaninas

Job Title:

**Key Topic:** Food Groups

Sub Topic: Fruits, Grains, Whole grains

Attachment: N

Comment: Please consider this a formal request for the USDA to restructure the current food pyramid structure to move fruits and vegetables to the base, and grains/starches up to the

previous space for fruits and vegetables. I respectfully request that your agency acknowledge there is something wrong with the food production/consumption structure in this country, and takes a proactive approach to fixing it. The first step is to correct the pyramid and educate people to eat a diet consisting primarily of fruits and vegetables.

From a young age Americans are told to consume more grains and starches which is part of the reason our obesity rate is currently at 63% and growing. Grains and starches result in stored energy, which unfortunately due to our sedentary lifestyle turns to fat. A diet based in fruits and vegetables will create a healthier nation.

It's time to bring our food pyramid into the 21st century, I appreciate your consideration.

Comment ID: 000841

Submission Date: 02/03/2010

Organization Type: Individual/Professional
Organization Name: Roman Meal Company

First Name: Steve

Last Name: Buckholdt

Job Title: VP, Quality & Regulatory

**Key Topic:** Food Groups

Sub Topic: Grains, Whole grains

Attachment: Y

Comment: Roman Meal Company has been in the whole grain food business for nearly 100 years. We support all the submitted comments validating the importance of increasing whole

grains in the U.S. diet. It is important that the 2010 Dietary Guidelines stress the consumption of whole grains to the consumer.

It is recommended that the Advisory Committee find a suitable replacement for the term "ounce equivalents" when stating to the consumer how much whole grains should be

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#### Submission Date Between 10/29/2009 and 04/07/2010

**Key Topic: Food Groups** 

consumed. This term is confusing and is not widely used by industry nor is it understood by the consumer. Please see the attached letter for more information. Thank you for the opportunity to provide feedback to the Advisory Committee.

**Comment ID: 000868** 

**Submission Date:** 02/19/2010

Organization Type: Individual/Professional

Organization Name:

First Name: Christina

Last Name: Goldpaint

Job Title: Health Educator

Key Topic: Food Groups

Sub Topic: Fruits, Grains, Whole grains, Milk, Vegetables

Attachment: Y

Comment: Almost 70% of our population is overweight or obese in the United States. It is time to make the Dietary Guidelines for Americans the ?Gold Standard? for health; it should not be influenced by lobbyists from corporations such as the National Dairy Council, National Cattlemen?s Beef Association, or Pork Institute. The Dietary Guidelines should emphasize vegetables, fruits, whole grains, and legumes.

For example, fortified Soy Milk has as much calcium as mammalian milk from cows, yet it is not included in the Dietary Guidelines. Almond milk only has 40 calories in eight ounces versus 150 calories in eight ounces of 2% milk, or 190 calories in eight ounces of chocolate milk. It is also disgraceful that the American Dietetic Association is endorsing flavored milk loaded with sugar as a ?healthy choice? for our youth, and a way to get more milk into their diets. Changing the emphasis from dairy products to fortified milk alternatives could have a beneficial impact on our nation?s health by decreasing obesity.

Research has shown the effects of improving, and even reversing, chronic conditions such as coronary heart disease, hypertension, high cholesterol, and type two diabetes with a low-fat vegan diet. Why isn?t this research presented as the new ?Gold Standard? for the Dietary Guidelines?

The Food Guide Pyramid, MyPyramid.com, and basic 4 food groups have all had the same components in place: servings from ?lean meats? and ?low-fat or fat-free dairy products.? The Dietary Guidelines haven?t even conveyed the importance of whole grains instead of refined ?enriched? grains; for example, MyPyramid?s slogan of ?Make half your grains whole.? Why is the emphasis on only making half the grains whole grains instead of all of them? These food guidelines have been in place for decades, yet our nation is getting more overweight, obese, and chronically diseased. It?s time for a drastic change in the Dietary Guidelines; one that will bring back our nation?s health.

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#### Submission Date Between 10/29/2009 and 04/07/2010

**Key Topic: Food Groups** 

**Comment ID:** 000805

Submission Date: 01/21/2010

Organization Type: Individual/Professional

Organization Name:
First Name: Katie
Last Name: Fearer

Job Title:

**Key Topic:** Food Groups, Other

Sub Topic: Milk
Attachment: N

Comment: Please provide better guidance for people who can't eat dairy or soy. Dairy (with or without lactose) makes many people (including me) very ill. Dairy and soy allergies are two of

the most common food allergies. Yet dairy is heavily emphasized in the 2005 guidelines, and guidance for people who can't consume dairy or soy is buried on your web site.

Thank you for considering my comments.

Comment ID: 000768

Submission Date: 12/02/2009

Organization Type: Individual/Professional

Organization Name: First Name: Jan

Last Name: Stapinski

Job Title: Teacher

**Key Topic:** Food Groups, Protein

Sub Topic: Attachment: N

Comment: As a Nutrition teacher, it seems without fail, students have difficulties with the "Meat and Bean" group in the current Food Guide Pyramid when it comes to understanding

complete and incomplete proteins. Inevitably, they believe that because the word "bean" is a part of the pyramid, they receive the full benefits of a complete protein by eating only

beans!

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# Submission Date Between 10/29/2009 and 04/07/2010

**Key Topic: Food Groups** 

Comment ID: 000895

Submission Date: 03/26/2010

Organization Type: Industry Association
Organization Name: American Meat Institute

First Name: Betsy
Last Name: Booren

Job Title: Director of Scientific Affairs

**Key Topic:** Eating Patterns, Fluid and Electrolytes, Food Groups, Food Safety, Protein

Sub Topic: Meat, Beans, Eggs, Fish, and Nuts, Sodium

Attachment: Y

Comment: Please see attached document for comments.

**Comment ID:** 000804

Submission Date: 01/21/2010

**Organization Type:** Industry Association

Organization Name: Bush Brothers & Company

First Name: Sara
Last Name: Rose

Job Title: Vice President and Director, Strategic Business Development

**Key Topic:** Food Groups, Minerals

Sub Topic: Meat, Beans, Eggs, Fish, and Nuts, Sodium, Vegetables

Attachment: Y

Comment: Please see attached comments submitted by Sara Rose, Bush Brothers & Company.

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#### Submission Date Between 10/29/2009 and 04/07/2010

**Key Topic: Food Groups** 

**Comment ID:** 000819

Submission Date: 01/26/2010

Organization Type: Industry Association
Organization Name: United Egg Producers

First Name: Gene
Last Name: Gregory
Job Title: President

**Key Topic:** Food Groups, Nutrient Density/Discretionary Calc

Sub Topic: Meat, Beans, Eggs, Fish, and Nuts

Attachment: Y

Comment: Attached are the comments of Gene Gregory, President of the United Egg Producers, which address the related issues of egg consumption, dietary cholesterol, and choline

adequacy in a diet.

**Comment ID:** 000832

Submission Date: 02/01/2010

**Organization Type:** Nonprofit/Voluntary

Organization Name: Oldways

First Name: Sara

Last Name: Baer-Sinnott

Job Title: Executive Vice President

Key Topic: Eating Patterns, Food Groups

Sub Topic: Fruits, Grains, Whole grains, Other, Vegetables

Attachment: Y

Comment: With this letter, we want to highlight:

(a) the importance of cooking and preparation methods for the overall health for Americans, (b) the importance of including all plant foods in the Guideline recommendations,

without distinguishing one from another.

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#### Submission Date Between 10/29/2009 and 04/07/2010

**Key Topic: Food Groups** 

**Comment ID:** 000923

Submission Date: 04/07/2010

**Organization Type:** Nonprofit/Voluntary

Organization Name: Grains for Health Foundation

First Name: Len

Last Name: Marquart

Job Title: President

**Key Topic:** Evidence-based Review Process, Food Groups

Sub Topic: Grains, Whole grains

Attachment: Y

Comment: While the current recommendation that half of grain servings be whole grain seems to be adequate, we feel that there should be additional guidelines that would help the public

achieve this recommendation and would help the food industry to supply greater variety and amount of whole grain food in more eating contexts. We also believe that additional

emphasis on eating foods that emphasize the bran and germ of the grain would also be helpful to the public.

Comment ID: 000830

Submission Date: 02/01/2010

**Organization Type:** Nonprofit/Voluntary

Organization Name: California Walnut Commission

First Name: Dennis A.

Last Name: Balint
Job Title: CEO

**Key Topic:** Fats, Food Groups

**Sub Topic:** Fish oil, Omega 3 fatty acids, Meat, Beans, Eggs, Fish, and Nuts

Attachment: Y

**Comment:** Dietary Guidelines Comments 2010

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#### Submission Date Between 10/29/2009 and 04/07/2010

**Key Topic: Food Groups** 

**Comment ID:** 000856

Submission Date: 02/10/2010

**Organization Type:** Nonprofit/Voluntary

Organization Name: International Tree Nut Council Nutrition Research & Education Foundation

First Name: Maureen Last Name: Ternus

Job Title: Executive Director
Key Topic: Food Groups

Sub Topic: Meat, Beans, Eggs, Fish, and Nuts

Attachment: Y

Comment: Comments Attached

Comment ID: 000776

Submission Date: 12/15/2009

**Organization Type:** Nonprofit/Voluntary

Organization Name: Physicians Committee for Responsible Medicine

First Name: Neal
Last Name: Barnard
Job Title: President
Key Topic: Food Groups

**Sub Topic:** Meat, Beans, Eggs, Fish, and Nuts

Attachment: N

Comment: Dear Dr. Van Horn:

I am sure the Dietary Guidelines Advisory Committee is in the midst of its deliberations on the new Guidelines, and I wish you the best in what must be a Herculean task.

I wanted to raise a quick point about the Institute of Medicine?s recent report and its language on processed meat in school lunches. As you know, the IOM report, ?School Meals: Building Blocks for Healthy Children,? included the following language:

Although meats that are preserved by smoking, curing, or salting, or by the addition of preservatives are sometimes lean, they usually are very high in sodium. Because of their sodium content and because the consumption of such processed meats, especially processed red meats, has been linked with an increased risk of colorectal cancer in adults (WCRF/AICR, 2007), less frequent use of even low-fat versions of these meats may be advisable (p. 122).

Needless to say, health authorities are greatly concerned about the long-term risks of processed meat consumption, particularly with regard to cancer. However, if the Dietary

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#### Submission Date Between 10/29/2009 and 04/07/2010

**Key Topic: Food Groups** 

Guidelines do not specifically mention this issue, school officials will have a difficult time in reducing or eliminating processed meats from their menus. A mention of this issue in the strongest possible terms would provide the mandate and authority they need, and would be very much appreciated. I hope this is something the Committee can consider.

It has long been clear that eliminating meats in general or processed meats in particular is a reasonable and healthful choice. However, many people do not yet understand the converse, which is that including meat, particularly processed meat, in the diet clearly increases risks for overweight, diabetes, and certain cancers, among other problems. As the Adventist Mortality Study, the Adventist Health Studies, and the European Prospective Investigation into Cancer and Nutrition, and other studies have shown, animal product ingestion increases health risks.

Thank you for your kind consideration.

**Comment ID:** 000903

Submission Date: 04/02/2010

**Organization Type:** Nonprofit/Voluntary

Organization Name: The Whole Grains Council and Oldways

First Name: Cynthia

Last Name: Harriman

Job Title: Director of Food & Nutrition Strategies

**Key Topic:** Food Groups

Sub Topic: Grains, Whole grains

Attachment: Y

Comments in attached PDF

Comment ID: 000786

Submission Date: 01/05/2010
Organization Type: Other

Organization Name:
First Name: Shane
Last Name: Martinez
Job Title: Student

**Key Topic:** Eating Patterns, Food Groups, Food Safety, Minerals, Other, Vitamins

Sub Topic: Calcium, Iron, Meat, Beans, Eggs, Fish, and Nuts, Milk, MyPyramid, Other, Vitamin D

Attachment: N

Comment: The milk group should not be MILK, but CALCIUM group since that is what that group pertains to. We should have the option and info to know different calcium food sources.

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#### Submission Date Between 10/29/2009 and 04/07/2010 Key Topic: Food Groups

Olive oil should be given more credit in the oils group like the Mediterranean pyramid and limit other vegetable oils. I also think you should take steps to reduce meat consumption in the meat and beans group. Set a number of ounces of meat per week, not per day. Include a link to EPA fish advisories for mercury content of fish in their area. We must take into consideration environmental toxins because nutrition is evolving. Agriculture is evolving.

Fluoride should be further researched and provide data that it may be over-consumed in children because of tap water and brushing teeth with sodium fluoride. It is not essential in Europe which makes me wonder why. Emphasize sunlight for vitamin D and not fortified foods because I have noticed most fortified foods contain D2 and not D3. Emphasizing sunlight will also increase activity levels.

We need to understand mineral ratios such as iron, copper, and zinc; sodium and potassium; calcium and magnesium etc.

Thank you and looking forward to great changes!!! Shane Martinez

**Comment ID:** 000872

Submission Date: 02/22/2010
Organization Type: Other

Organization Name: Integral Growth

First Name: Susanne
Last Name: Bennett
Job Title: Coach

Key Topic: Food Groups

**Sub Topic:** Grains, Whole grains, Vegetables

Attachment: N

Comment: In view of the work that has been done for the last 50 years on eating for one's type of blood, it would be wise to consider that the American diet is not a one size fits all

phenomenon. Some balance could be achieved if people were encouraged to know their blood type and eat accordingly. Blood type "O" would then be our red meat eaters while blood type "A" would eat more vegetable based proteins.. IN ANY CASE, all blood types could be encouraged to eat real vegetables at every meal, at least 3 at dinner (not potatoes, rice and other high glycemic foods) along with their appropriate protein. Milk and highly processed grain foods and sugary foods should really be discouraged like we discourage tobacco. US Gov't could subsidize vegetable growers at its highest level of subsidy instead of meats and grains.

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#### Submission Date Between 10/29/2009 and 04/07/2010

**Key Topic: Food Groups** 

**Comment ID:** 000867

**Submission Date:** 02/19/2010

Organization Type: Other

**Organization Name:** 

First Name: Last Name:

Job Title:

**Key Topic:** Food Groups

Sub Topic:

Attachment: N

Comment: Fat was considered a food group. However, I am being told that fat is no longer a food group. Is fat a food group that should have limited intake or has it been eliminated from

the food group?

Comment ID: 000749

Submission Date: 11/04/2009

Organization Type: Other

Organization Name: Rice Management, Inc

First Name: Carol Last Name: Ward

Job Title: Wellness Corrdinator

**Key Topic:** Food Groups

Sub Topic: Other

Attachment: N

Comment: Please have printable copies of the the serving sizes of each key food group. I really like the look up food online piece, however alot of people do not have a computer and I am

helping get the information to them.

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#### Submission Date Between 10/29/2009 and 04/07/2010

**Key Topic: Food Groups** 

Comment ID: 000754

Submission Date: 11/06/2009
Organization Type: Other

Organization Name: Whitney's Foods

First Name: Nadine M
Last Name: Doetterl

Job Title: VP Whitney's Foods

**Key Topic:** Food Groups

Sub Topic: Milk
Attachment: Y

Comment: Please see comments regarding the use of nutrient dense milk in Child Nutrition Programs administered by USDA

Comment ID: 000785

Submission Date: 12/30/2009
Organization Type: Other

Organization Name: Livingston Medical Group

First Name: Isabel
Last Name: Benavidez

Job Title: Health Educator
Key Topic: Food Groups

**Sub Topic:** Grains, Whole grains

Attachment: N

Comment: Whole grains provides a large sources of vitamins, minerals, and fiber. Also, can't digest as refines white flours. Keep insulin levels from rising, keep hunger at bay and so on.

Why is recommended only half of the grains to come from whole grain. I truthfully believe that recommendations should be everything whole grains. In 1970 Dr. Denis Burkitt proved to us that the fiber is very beneficial and he made his point comparing the two different cultures and the grains we choose to eat. So my question again. WHY IS RECOMMENDED ONLY HALF OF THE GRAINS TO COME FROM WHOLE GRAINS? My suggestion, I would like to see whole grains to be recommended an to limit as much

as posible white refined flours. Thanks! Isabel

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#### Submission Date Between 10/29/2009 and 04/07/2010

**Key Topic: Food Groups** 

**Comment ID:** 000836

Submission Date: 02/02/2010

Organization Type: Professional Association

Organization Name: American Society for Nutrition

First Name: Mary Lee

Last Name: Watts

Job Title: Director of Science and Public Affairs

Key Topic: Carbohydrates, Eating Patterns, Evidence-based Review Process, Fluid and Electrolytes, Food Groups, Food Safety, Protein

Sub Topic: Added sugars, MyPyramid, Sodium

Attachment: Y

Comment: The American Society for Nutrition (ASN) appreciates this opportunity to submit comments to the 2010 Dietary Guidelines Advisory Committee (DGAC) in advance of the fifth

meeting on Feb 9-10, 2010. We are pleased that the DGAC has taken on numerous challenging questions in a rigorous, thoughtful manner. As the Committee engages in final deliberations on the topics and questions, we offer a few final points (see attachment). We hope these comments are useful as the Committee moves forward with its work.

Sincerely.

Robert M. Russell, MD ASN President 2010-2011

**Comment ID: 000816** 

Submission Date: 01/25/2010

Organization Type: State/Local Government Agency

Organization Name: McCain Foods (Canada)

First Name: Jayne

Last Name:MacDonaldJob Title:DietitianKey Topic:Food Groups

Sub Topic: Vegetables

Attachment: Y

Comment: McCain Foods would like to make the 2010 Dietary Guidelines for Americans Advisory Committee aware of some new data which shows that white potatoes, even as French

fries, contribute positively to the dietary nutrient intake of Americans. This data was presented at the 2009 American Dietetics Association Food & Nutrition Conference & Expo in

Denver.

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